REMARKS/ARGUMENTS

1.) Claim Amendments

The Applicants have amended Claims 12, 15, 16, 18, 19, 20, and 22. No claims have been added or canceled. Support for the amendments may be found, for example, at original Claims 15 and 16. Applicants respectfully submit that no new matter has been added. Accordingly, Claims 12-22 continue to be pending in the Application. Favorable reconsideration of the Application is respectfully requested in view of the foregoing amendments and the following remarks.

2.) Examiner Objections – Information Disclosure Statement

The Information Disclosure Statement filed on March 2, 2006, was objected to because "the international references [...] were not included in the image file wrapper, and the disclosed US PG Pub could not be found."

In response, Applicants will submit a copy of the applicable references. The Examiner's consideration of the cited and submitted references, and indications of such consideration, is hereby respectfully requested.

3.) Examiner Objections – Drawings

The Drawings were objected to because "Figure 1 should be designated by a legend such as --Prior Art-- because only that which is old is illustrated."

This Objection is respectfully traversed. The corresponding US Patent Application Publication 2006/0268921 (and the published priority document, PCT/SE2003/001391 / WO2005/025257) already includes a "PRIOR ART" designation. The Examiner's attention is respectfully directed to the top left quadrant of Fig. 1.

If this designation cannot be found on some copy or version of the Drawings within USPTO, a further clarification from the Office is requested. Otherwise, withdrawal of the objection to the Drawings is hereby respectfully requested.

4.) Claim Rejections – 35 U.S.C. §101

The Examiner rejected Claims 12-19 on the asserted basis that those claims are "directed to non-statutory subject matter." The Office action on page 2 at paragraph #4 reads in pertinent part, "The methods in claims 12-19 simply recite a method that could be embodied in a data structure or mental steps."

This rejection is respectfully traversed. Claims 12-19 include independent Claims 12 and 15. These two claims include steps of storing, setting, re-routing, and monitoring. By way of example only, the steps of "storing in a database" and "setting up a connection" cannot be embodied in a data structure. Additionally, the steps of "setting up a connection" and "re-routing a media flow" cannot be performed with mere mental steps alone. Reconsideration of this non-statutory subject matter rejection is therefore respectfully requested.

Accordingly, withdrawal of the rejection under 35 U.S.C. §101 is hereby respectfully requested.

5.) Claim Rejections – 35 U.S.C. § 103 (a)

Claims 12-14 & 20 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Goldberg, *et al.* (US 6,411,683) in view of Ford, *et al.* (US 7,400,711).

Claims 15-18 & 21 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Goldberg, *et al.* (US 6,411,683) in view of Ford, *et al.* (US 7,400,711) and Easterling, *et al.* (US 5,428,667).

Claim 19 stands rejected under 35 U.S.C. 103(a) as being unpatentable over Goldberg, *et al.* (US Patent No. 6,411,683) in view of Ford, *et al.* (US Patent No. 7,400,711) in further view of Easterling, *et al.* (US Patent No. 5,428,667) as applied to claim 15 above and in further view of Raphaeli, *et al.* (US Patent No. 7,020,784).

Claim 22 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Goldberg, *et al.* (US 6,411,683) in view of Ford, *et al.* (US 7,400,711) and further in view of Raphaeli, *et al.* (US 7,020,784).

By way of example only, Claim 12 now reads as follows:

> 12. (Currently Amended) A method for monitoring media flow in a telecommunication network having a control domain for handling session control and a bearer domain for handling media flow, comprising the steps of:
>
> storing, in a database in the control domain, identification of a first subscriber for which monitoring is desired;
>
> setting up a connection between the first subscriber and a second subscriber;
>
> *re-routing a media flow between the subscribers via a server function in the bearer domain, the server function at a fixed location that is independent from a change of location of the subscribers involved in the media flow;* and,
>
> monitoring the media flow that passes the server function at the fixed location.
>
> (*italicized* emphasis added)

The current Office action appears to attempt to address these elements at Page 10 at the second paragraph. This paragraph reads as follows:

> Goldberg et al. does not teach re-routing of a media flow session for which monitoring is desired, via a fixed location, which location is independent by change of location of subscribers involved in the media flow. *However, Easterling et al. teaches re-routing of a media flow session for which monitoring is desired [Easterling, fig. 4, column 12, lines 5-9, "This is especially helpful in establishing a case for the wiretap authorities in that all conversations for a particular target unit can be routed to a designated monitoring station so that all those conversations are monitored and recorded in sequence"*, The call can be routed so that authorities can monitor it in real time.], via a fixed location [Easterling, fig. 4, element 78, paragraph 0058, "computer-based controller 78"], which location is independent [Easterling, fig. 4, element 78, paragraph 0058, "computer-based controller 78"] by change of location of subscribers involved in the media flow [Easterling, fig. 4, elements 14 &16].
>
> (*italicized* emphasis added)

Easterling appears to be directed to "A multi-channel cellular communications intercept system for monitoring and then intercepting communications between a mobile unit and a base station in one cell of a cellular telephone system." (Easterling; the Abstract.)

Easterling reads as follows from Column 11, Line 67 to Column 12, Line 9:

> In the communications intercept system 70 note that the system controller 78 can choose any receiver 71 through 74 to be the monitoring receiver for conversations from any target mobile unit, and thus in effect can have that target mobile unit conversation monitored on any one of the monitoring stations 92, 94, 96, and 98. This is especially helpful in establishing a case for the wiretap authorities in that all conversations for a particular target unit can be routed to a designated monitoring station so that all those conversations are monitored and recorded in sequence.

Looking to FIG. 6 of Easterling, monitoring stations 92, 94, 96, and 98 are one-way destinations for the monitored conversations. Easterling only teaches that monitored conversations can be forwarded to a monitoring station.

Thus, it is respectfully submitted that Easterling does not teach "*re-routing a media flow between the subscribers via a server function in the bearer domain*, the server function at a fixed location that is independent from a change of location of the subscribers involved in the media flow" (e.g., from Claim 12).

In the Application, there is a one-way forwarding of information as shown in Fig. 2 from LI-S to LEMF. The Application reads in paragraph [0027] as follows: "During the whole media flow session, the DF forwards all the content flowing in both directions between A and B, from LI-S to a Lawful interception Enforcement Monitoring Function LEMF." This forwarding is performed over and above the media flow re-routing through the LI-S.

As shown in Fig. 2 of the Application, the media flow MF between subscriber A and subscriber B is re-routed through the LI-S. In other words, instead of merely being routed between EDGE-A and EDGE-B, the media flow between subscriber A and subscriber B is re-routed through LI-S in addition to EDGE-A and EDGE-B.

Furthermore, this re-routing of the media flow MF between subscriber A and subscriber B though the LI-S is fixed. As shown in Fig. 5, even when subscriber A moves to a different access network (e.g., access network ACNW-C), the location (e.g., LI-S) through which the re-routing of the media flow MF between subscriber A and subscriber B occurs remains fixed (e.g., fixed in access network ACNW-A). The information *also* continues to be forwarded to the LEMF.

Even assuming, *arguendo*, that the asserted combination of references is legally and factually permissible, such a combination of Easterling with any other reference(s) (e.g., Goldberg and/or Ford, etc.) would not result in the claimed invention. Monitored communications would merely be forwarded to a listening/recording post. There is no teaching in the art of record to re-route a media flow between subscribers via a server function that is at a fixed location for the purpose of monitoring the media flow.

It is therefore respectfully submitted that no art of record, either alone or in any combination, anticipates or renders obvious at least the following elements in conjunction with the other elements of their respective claims:

Claim 12: re-routing a media flow between the subscribers via a server function in the bearer domain, the server function at a fixed location that is independent from a change of location of the subscribers involved in the media flow.

Claim 15: re-routing a media flow between the subscribers for which monitoring is desired via a server function in the bearer domain, the server function at a fixed location that is independent from a change of location of the subscribers involved in the media flow.

Claim 20: means for re-routing the media flow between the subscribers via a server function in the bearer domain, the server function at a fixed location that is independent from a change of location of the subscribers involved in the media flow.

With regard to dependent Claims 19 and 22, they further recite "exchanging an address to the server function with a pseudo address in order to hide the re-routing of the media flow via the server function from the first and second subscribers."

It appears that the current Office action attempts to reject these two claims based on Raphaeli. However, Raphaeli is directed to "a mechanism for detecting intrusion and jamming attempts by an imposter node." (Raphaeli; the Abstract) Raphaeli is intending to combat "a problem that can potentially plague shared media type networks [in which there] is the possibility that an intruder may attempt to enter the network by using the addresses of active nodes in the network." (Raphaeli; Column 1, Lines 16-19.)

It is therefore respectfully submitted that Raphaeli does not teach "exchanging an address to the server function with a pseudo address." Consequently, it is respectfully submitted that dependent Claims 19 and 22 are allowable for this additional reason.

Accordingly, withdrawal of the rejections under 35 U.S.C. §103(a) is hereby respectfully requested.

The Applicants have amended Claims 12, 15, 16, 18, 19, 20, and 22 to better define the intended scope of the claimed invention. The Examiner's consideration of the amended Claims is respectfully requested.

Claims 13-14, 16-19, and 21-22 depend directly or indirectly from amended independent Claims 12, 15, and 20, respectively, and they recite further limitations in combination with the novel and non-obvious elements of Claims 12, 15, and 20. Therefore, the allowance of all pending Claims 12-22 is respectfully requested.

CONCLUSION

In view of the foregoing remarks, the Applicants believe all of the claims currently pending in the Application to be in a condition for allowance. The Applicants, therefore, respectfully request that the Examiner withdraw all rejections and issue a Notice of Allowance for all pending claims.

The Applicants request a telephonic interview if the Examiner has any questions or requires any additional information that would further or expedite the prosecution of the Application.

Respectfully submitted,

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